

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Fair Isaac Corporation, a  
Delaware corporation,

Court File No. 16-cv-01054  
(WMW/TNL)

Plaintiff,

v.

**[PROPOSED] AMENDED ANSWER  
TO SECOND AMENDED  
COMPLAINT AND  
COUNTERCLAIMS**

Federal Insurance Company, an  
Indiana corporation, and Ace  
American Insurance Company, a  
Pennsylvania corporation,

Defendants.

---

Defendants Federal Insurance Company (“Federal”) and ACE American Insurance Company (“ACE American”) (collectively, “Defendants”), hereby answer the Second Amended Complaint of Plaintiff Fair Isaac Corporation (“FICO”) as follows:

To the extent not expressly admitted, denied or otherwise qualified, Defendants deny each and every allegation in the Second Amended Complaint.

**NATURE OF ACTION**

1. This is an action for breach of contract and copyright infringement related to business software owned by FICO and licensed to Chubb & Son, a division of Federal Insurance Company (“Chubb & Son”).

**RESPONSE:** Answering Paragraph 1, Defendants admit that FICO asserts claims for breach of contract and copyright infringement. Defendants deny any breach or infringement and states that FICO’s claims are without merit.

